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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,

Case No. 3:20-cv-06570-TSH

Plaintiff,

**JOINT NOTICE OF SETTLEMENT,
STIPULATION FOR DISMISSAL, AND
[PROPOSED] ORDER**

COUNTY OF ALAMEDA, ,

Defendant.

1 **JOINT NOTICE OF SETTLEMENT AND STIPULATION FOR DISMISSAL**

2 TO THE COURT AND ALL PARTIES OF RECORD:

3 PLEASE TAKE NOTICE that Plaintiff Lisamaria Martinez and Defendant County of
 4 Alameda have reached a full settlement of this action and have executed a Settlement Agreement
 5 and Release. The Settlement Agreement expressly provides that the settlement “shall have no
 6 impact on the Permanent Injunction, which remains in place with full force and effect.”

7 (Settlement Agreement §1(c), attached as **Exhibit A.**)

8 Accordingly, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Parties stipulate
 9 and agree as follows:

- 10 • That this action shall be dismissed with prejudice as to all claims between Plaintiff
 Lisamaria Martinez and Defendant County of Alameda;
- 11 • That, subject to the Court’s approval, all pending deadlines and hearings in this matter
 shall be vacated and the case closed; and
- 12 • That the Court enter such further relief as the Court deems appropriate, including
 retaining such jurisdiction as the Court deems necessary to enforce the terms of the
 parties’ Settlement Agreement if enforcement becomes necessary.

13 A proposed order for the Court’s consideration, consistent with the terms of the Settlement
 14 Agreement, accompanies this Joint Notice of Settlement and Stipulation for Dismissal.

15 Respectfully submitted,

16 DATED: December 1, 2025

17 TRE LEGAL PRACTICE

18 _____
 19 /s/ *Kristopher A. Nelson*
 20 Kristopher A. Nelson

21 *Attorneys for Plaintiff*

22 Respectfully submitted,

23 DATED: December 1, 2025

24 ORBACH HUFF & HENDERSON LLP

25 _____
 26 /s/ *Kevin E. Gilbert*
 27 Kevin E. Gilbert

28 *Attorneys for Defendant*